

To whom it may concern,

Please find below comments on some aspects of the draft local plan in response to the consultation.

1. Strategic Policy SP SSI Spatial Strategy Option 2 Medium growth.

The selection of the Council's preferred option 2 making provision for 25,00 additional homes in the plan period should be revisited. It must be acknowledged that both Brexit and the pandemic will give rise to changes in both the quantity and type of housing provision which will be required in the future. It is too early to know how exactly this will pan out, but it seems certain that less houses will be required and that those that are will need to be for families and that home working and an increased requirement for outside space will have to be catered for.

In the light of this it seems to be unnecessary and stubborn of the Council to persist in pursuing an option which will clearly be very unpopular and which will introduce uncertainty and blight to areas of precious rural space. The figure of 25,000 houses appears to have been reached by a simple computation based on an assumption that the same degree of allocation will be required in the second 10 year period that the plan covers, which must now be in doubt, so that the draft Plan is making provision for a greater allocation of housing than will actually be required to be in conformity with the London Plan.

If the Crews Hill and Chase Park proposals were entirely excluded there would still be a greater allocation than under option 1. In addition, it would be possible to retain elements of Chase Park, say the site south of Enfield Road and that of proposed greater density closest to Chase Farm Hospital, as well as those parts of Crews Hill which are brownfield and degraded, without touching the remaining Green Belt land which is so important to so many residents and has proved to have been such a wonderful resource during the pandemic.

Surely, if the Green Belt boundary is to be changed, this should be after a full assessment of the whole of the Green Belt land and also after full consideration has been given to whether it would be more appropriate for other land, which may be sited nearer to existing Town Centres or transport hubs (such as Bush Hill and Enfield Golf Clubs) to be taken before resorting to more distant and precious parts of the Green Belt.

2. Policy SP PL8 Rural Enfield

The many references to the London National City Park designation are not understood. Surely the London National Park City is a concept which applies to the whole of London and not to the small part which Enfield Council has decided to "designate" and which seems to be just the Enfield Green Belt land with all the parts allocated for housing development taken out, leaving the so called "major Green Infrastructure corridor" in the north of the Borough. This has been presented in a very misleading way, verging on the dishonest. The Council has hijacked the nomenclature of the City Park movement

whilst in fact eroding its principles and aims by proposing to remove Green Belt protection. The Plan asserts that this designation would give the land protection from development once the Green Belt status was removed. Surely, for this to happen the designation would need to have some basis in law or statute, as does the Green Belt. Unless the designation carries this authority it cannot prevent the land from gaining planning permission for inappropriate development once the Green Belt protection is removed, which could have disastrous consequences.

Many of the aims and proposals in this section are to be welcomed but the idea of encouraging eco-tourism in this relatively small area, soon to become even smaller if the Chase Park and Crews Hill developments proceed, is ill-conceived. It would no longer be a green and pleasant land for the eco-tourism which is envisaged, with insufficient space for the visitor centre, camp sites, bed and breakfasts, self-catering holiday lets, sports activities etc. etc proposed in this policy and in RE4 and CL3. Already the swifts are disappearing from our skies; what birds would be left to be watched? The proposal for eco-tourism is disastrous, whether or not Crews Hill and Chase Park are developed, and anathema to the concept of the Green Belt and preserving genuinely wild areas. Visitors from outside the Borough would undoubtedly put further stress on the already over-stretched road network, and cause the fast-diminishing rural areas to become overcrowded and degraded as has become obvious over the last 18 months. These areas are a valuable resource for the borough's residents and should remain so. Efforts should be made to improve connections to make them more accessible Borough wide, but not further afield.

3. Policy SP PL9 Crews Hill

It is not understood why Crews Hill is regarded as an appropriate site for 3,000 homes. It is accepted that there are sites which have become degraded and that the public's appetite for Garden Centres has diminished leaving parcels of land which are appropriate for redevelopment as housing. It is not accepted that houses should be built beyond this area into the wider Green Belt. The proposals describe a sort of eco labour camp where somehow, despite a "consolidated and compact" form of development, the residents would be able to grow their own food (which does of course require a large amount of land) and live self-sufficient lives with only brief forays out of the area via the twice an hour train from Crews Hill Station or by cycling into the wider Green Belt. It is difficult to envisage who would want to live a life in this way and indeed this whole section seems to be particularly ill-thought out and naïve.

4. Policy SP PL10 Chase Park

The loss of this part of the Greenbelt would be a considerable blow. It is a lovely tract of land which gives a number of different rambling opportunities towards Trent Park or around the valley and is a vital component to Enfield's rural character. As indicated earlier, every effort should be made to avoid losing it. Consideration should be given to restricting the land taken to the areas south of Enfield Road, which should be developed to a similar density to the surrounding housing, and the parcel adjacent to Chase Farm Hospital for more dense development.

5. Policy SP PL1 Enfield Town and DM DE6 Tall Buildings

The statement at paragraph 9 that tall buildings and other high-density developments will be concentrated around the railway stations, other key gateways and parts of the retail core and London Road should be amended to make it clear that tall buildings are not appropriate within the Enfield Town Conservation Area. The Conservation Area is not an "appropriate urban location" for a tall building, no matter how exemplary in quality that building might be and the Plan should not be acknowledging this possibility. Any tall building would totally and comprehensively detract from the character of the Area. Nor would one be appropriate on the elevated ground above the Conservation Area at Enfield Chase Station, where it would loom over the Gateway to the Town, belittling the War Memorial and the green spaces. Growth can be achieved by re-development in a different form, to provide higher density without excessive height as is acknowledged at 7.6.4, and this is the type of development the Plan should be actively

seeking in the Enfield Town Conservation Area and not tall buildings. Tall buildings are disliked and, especially after Grenfell, much feared. They are cannot to provide the family accommodation, or the outside space which is now so sought after. There will no longer be the demand for one and two bedroomed flats for those commuting into London every day especially now that Central London Authorities are beginning to address the large-scale conversion of high-rise offices to residential use. Tall buildings are also inappropriate in other Conservation Areas and adjacent to Listed Buildings and the Plan should be amended accordingly.

6. Policy SA54 New Logistics Hub close to Junction 24

This would be a highly visible and ugly introduction to the road to Enfield from the M25, and would undermine the idea of a green corridor approach which the Plan seeks to promote. It would be an isolated scar, spoiling the openness of the view and would be detrimental to nearby development. A more appropriate site should surely be found.

7. Points of Detail:

- Enfield Town figure 3.2. There is no Local Heritage Asset designation around Chase (or Enfield) Green.
- 12.4.1 The reference to a golf course at Whitewebbs is unfortunate, as is the omission of Equestrian pursuits which are so significant and evident in the Green Belt.
- 12.5.1 The Council should not be contemplating the further provision of golf courses when there is already over-provision in the Borough and it is actively contemplating promoting building houses on Crews Hill Golf Club.
- Table 7.1 The view at 9 is not down to Chase Court Gardens, but right over the Town to Chingford and Epping Forest. It is similar to the very fine view from the top of Lavender Hill, which sadly gets no mention.